

Jorge Alejandro Rojas  
[Rojas.jorge96@gmail.com](mailto:Rojas.jorge96@gmail.com)  
Plaintiff in Pro Se  
557 Cambridge Way  
Bolingbrook, IL 60440  
424-219-1582

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

JORGE ALEJANDRO ROJAS,  
Plaintiff,  
v.  
UNPLUGGED MEDIA, LLC, et al,  
Defendants.

Case No. 2:23-cv-02667-AH-KS

**DECLARATION OF JORGE  
ALEJANDRO ROJAS IN  
OPPOSITION TO DEFENDANT  
ALEXANDER BYKHOVSKY'S  
"REQUEST TO SET ASIDE DEFAULT  
JUDGMENT"**

I, Jorge Alejandro Rojas, an adult of sound mind, declare as follows:

1. I am the Plaintiff in this case, and make the following statements based on my personal knowledge and records. If called to testify concerning any of these statements, I will be able to do so.
2. I make the statements in this declaration as part of my opposition to Defendant Alexander Bykhovsky's ("Bykhovsky") May 29, 2025 "Request to Set Aside Default Judgment" (Dkt. 113).
3. I have not consented to service via e-mail or other electronic means, other than for filings made by the filer directly into CM/ECF, for filings made by Bykhovsky.

4. I have not received an email from Bykhovsky which contained his May 29, 2025 filing. I in fact received the filing via USPS First Class Mail.
5. I emailed Bykhovsky, at the address that the parties have communicated using in the past, on November 14, 2024, informing him of an intent to seek default judgment.
6. I also emailed Bykhovsky on April 13, 2025, seeking to confer on Plaintiff's request for upcoming electronic appearance request.
7. I utilize Stamps.com to mail filings of court documents to defendants. My Stamps.com account reflects that I have mailed various filings at least 48 times during the pendency of this case to various addresses associated with Bykhovsky. My prior declaration, filed at Dkt. 106-1, describes how I mailed copies on several different addresses for Bykhovsky.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on June 8, 2025, in Bolingbrook, IL.



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Jorge Alejandro Rojas